State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
(216) 487-0769

George V. Voinovich
Governor
Donald R. Schregardus
Director

December 13, 1993

RE: VAN WATER AND ROGERS
CUYAHOGA COUNTY
OHD 017 107 791

Van Waters and Rogers Inc.
2723 South Cole Road
Boise, ID 83709

Attn: Mr. Michael V. Gaudette

Dear Mr. Gaudette:

On July 29, 1993, the Ohio EPA received a "Soil Sampling and Analysis Plan" from Van Waters and Rogers. I have reviewed the proposal. Approval to implement this plan is granted with the following conditions:

1) Notification

The district representative, Ms. Karen Nesbit, must be notified at least five (5) working days prior to the sampling event.

2) Samples Collected

All soil samples collected are to be submitted to the laboratory for analysis. The organic vapor analyzer (OVA) is to be used for field screening and monitoring purposes only. A sample could contain levels of organics which would not register with a field sized OVA.

Van Waters and Rogers should implement this next round of sampling and submit the laboratory results to the Ohio EPA Northeast District Office.

If you have further questions, you may contact my Supervisor, Harry Courtright or Ms. Nesbit at (216) 963-1200.

Sincerely,

Mark Bergman

Mark Bergman
Environmental Specialist
Division of Hazardous Waste Management

MB.wk

cc: Randy Meyer, DHWM, CO
Harry Courtright, DHWM, NEDO
Karen Nesbit, DHWM, NEDO
Steve Bouchard, USEPA Region V

Van Waters & Rogers Inc.
subsidiary of **Univar**

600 HUNTER DRIVE
OAK BROOK, IL 60521-1926
PHONE (708) 573-4300
FAX (708) 573-2536

September 28, 1992

Mr. Murat Tukel
Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

RE: Implementation of the Soil Sampling and Analysis Plan
Bedford Heights, Cuyahoga County, Ohio
OHD ~~ORD~~ 071 107 791

Dear Mr. Tukel:

Van Waters & Rogers Inc. (VW&R) received the Ohio Environmental Protection Agency's (OEPA) letter of September 10, 1992 on September 17, 1992. This letter formally notified VW&R that its soil sampling and analysis plan for the referenced facility was approved with three modifications and implementation of the Plan was to commence within thirty days. VW&R has retained Geraghty & Miller, Inc. to implement the Plan and expects to commence the soil sampling on October 5, 1992.

If you have any questions, please call me at 708/573-4361 or, leave a voice mail message at 800/284-6264, extension 8455.

Respectfully,

Michael V. Gaudette
Senior Project Manager

BH1/Tukel.992

MVG:be

cc: Steve Bouchard
U.S. EPA, Region V
Ohio RCRA Permitting Section - HRP-7J
77 West Jackson Blvd.
Chicago, IL 60604-3590

Van Waters & Rogers Inc.
subsidiary of **Univar**

2723 S. Cole Road
Boise, Idaho 83709
208/362-6545
208/362-6548 (FAX)

July 28, 1993

Mr. Mark Bergman
Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1969

RE: Soil Sampling and Analysis Plan
Bedford Heights, Cuyahoga County, Ohio
OHD 071 107 791

Dear Mr. Bergman:

Van Waters & Rogers Inc. (VW&R) is submitting this soil sampling and analysis plan in response to the May 1993 request by the Ohio Environmental Protection Agency (OEPA) for additional soil characterization in the vicinity of the former hazardous waste container storage area at the referenced facility and as discussed during a meeting on May 28, 1993 at the facility between VW&R and the OEPA. This phase of soil sampling was requested because compounds that were handled in the former hazardous waste container storage area were detected above the standard laboratory method detection limits (MDLs) in soil samples collected by Geraghty & Miller, Inc. during April 1992 and October 1992. Specifically, xylenes (total) were detected in the soil sample collected from soil boring SB-1 at 15 micrograms per kilogram (ug/kg), and 1,1,1-trichloroethane and tetrachloroethylene were each detected in the sample collected from boring SB-2 at 18 ug/kg during the April 1992 investigation.

Six compounds were detected in soil samples collected during the October 1992 investigation and included 1,1,1-trichloroethane at 37.8 ug/kg, tetrachloroethylene at 5.94 ug/kg, and ethylbenzene ranging from 87.2 ug/kg to 539 ug/kg. Methanol, xylenes, and acetone were also detected, but these detections were either slightly less than or slightly greater than the Method PQL. Details of Geraghty & Miller's sampling methodology and analytical results were documented in their reports to VW&R dated June 12, 1992 and December 1, 1992. A summary of the analytical data obtained from soil sampling activities is depicted on Figure 1 found in the December 1, 1992 report. This figure is also attached to this report.

VW&R will complete additional soil sampling activities adjacent to the former hazardous waste container storage area as specified in the soil sampling and analysis plan presented herein. The

necessity for soil excavation from beneath the former storage area, or implementation of other soil remedial activities, will be evaluated based on the soil analytical data.

SCOPE OF WORK

The soil sampling and analysis plan presented herein for the former hazardous waste container storage area is based on results of past soil sampling activities, discussions with the OEPA, and results of an internal investigation designed to identify areas where hazardous waste was stored at the facility. According to old RCRA Part A applications and employee interviews, the only location hazardous wastes were ever stored at the Bedford Heights facility was in the hazardous waste storage unit.

The soil sampling and analysis plan will consist of the following activities:

- Collection of soil samples,
- Analysis of each soil sample for volatile organic compounds previously detected in samples collected from beneath the concrete storage pad,
- QA/QC provisions, and
- Preparation of a report to document the sampling methodology and present analytical results.

VW&R proposes four coreholes be drilled through the concrete pad followed by advancement of soil borings through the unconsolidated materials to a depth of approximately five feet. Approximate locations are depicted on Figure 2. Coreholes will be drilled using an electric-powered coring device; soil borings will be drilled using a hand auger. The general locations of the soil borings will be along existing stress fractures in the concrete approximately ten feet from the perimeter of the former storage pad; three will be to the west and one will be to the east. Approximate locations of the borings are depicted on the attached figure. The exact locations of the borings will be finalized in the field. Upon completion of sample collection activities, the boreholes will be grouted with concrete.

Borehole locations were selected based on historic soil sampling data and the physical condition of the concrete surface cover adjacent to the former waste storage pad. For example, VOCs were only detected in the soil sample collected from borehole SB-2 in the 0 -1 foot depth interval, therefore, only one soil boring (SB-9) is proposed for the eastern side of the former storage pad.

Collection of two soil samples are proposed for boring SB-9 and include the 1.5 - 2 foot and 3 - 3.5 foot depth intervals. Three soil samples are proposed for collection from borings SB-10 and SB-11. These will be collected from the same intervals as SB-9 as well as from the 4.5 - 5 foot depth interval. Finally, since VOCs were only detected at the 1.2 foot depth in boring SB-5, only one soil sample will be collected from boring SB-12. This sample will be collected from the 1.5 - 2 foot depth interval.

A hand auger will be used to bore down to the zone to be sampled. The auger will then be removed from the borehole, decontaminated, and then placed back into the borehole. A soil sample shall be collected by advancing the hand auger an additional foot into the undisturbed sediments. After the auger is withdrawn from the borehole, a grab sample will be extracted from the hand auger and placed in appropriate sample containers provided by the analytical laboratory. Each soil sample shall be submitted to an analytical laboratory, under proper chain-of-custody, for chemical analysis. Analytes will include those VOCs detected during previous soil investigative activities. Specifically, acetone, ethylbenzene, 1,1,1-trichloroethane, xylenes, and tetrachloroethylene will be analyzed utilizing EPA Method 8240.

An organic vapor analyzer (OVA), or equivalent, will be utilized throughout the augering and sampling activities to screen the soil for VOCs. Screening will be conducted by placing a grab sample of soil in a glass jar, covering the jar's mouth with a foil sheet, and sealing the jar with a screw-type lid. After allowing for volatilization of organic vapors from the soil to the jar's headspace, the vapor concentration will be measured by removing the screw cap and piercing the foil sheet with the OVA's probe. The resultant measurement, in parts per million, will be recorded on appropriate sampling logs. A description of the soil shall also be recorded on the sampling log.

A quality assurance program consisting of collection of a duplicate soil sample and a rinsate blank will be implemented to monitor equipment decontamination procedures and laboratory performance. The duplicate soil sample will be collected by placing soil obtained from one of the sampling zones in two sample jars. Each jar will be marked with a separate sample identification and be analyzed for VOCs utilizing EPA Method 8240.

The rinsate blank will be collected after the soil sampling equipment has been decontaminated. Decontamination will consist of washing the equipment with a laboratory-grade soap and distilled water solution, followed by multiple distilled water rinses. After the last rinse is completed, an additional rinse will be performed and the rinsate collected in a sample jar supplied by the

laboratory and analyzed for VOCs utilizing EPA Method 8240. A report documenting the soil sampling activities and findings will be prepared and submitted to the OEPA. Supporting documentation will be included as attachments to the report.

SCHEDULE

The proposed sampling and analysis program can commence within four weeks of receipt of either written or verbal approval of this letter by the OEPA; whichever is sooner. If verbal approval is given first, however, VW&R requests that it be followed up by the OEPA with a written document. The four-week lead time is necessary since contractors generally require at least two weeks notice for scheduling purposes. The sampling and analysis program can be completed within 90 days of initialization of sampling activities. The turnaround time for the laboratory analysis will be approximately three to four weeks, depending on the laboratory and its work load.

If you have any questions or require additional information, please do no hesitate to contact me at (208) 362-6545, or leave a voice mail message at 1-800/284-6264, extension 8455.

Sincerely,

Michael V. Gaudette
Senior Project Manager

MVG:be

cc: Steve Bouchard
U. S. EPA, Region V
Ohio RCRA Permitting Section - HRP-7J
77 West Jackson Blvd.
Chicago, IL 60604-3590

Robert D. Hickman, VW&R, Northern Region Office
James P. Hooper, VW&R, Northern Region Office
Russell Karney, VW&R, Cleveland Area Office

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

George V. Voinovich
Governor
Donald R. Schregardus
Director

September 10, 1992

RE: VAN WATERS & ROGERS INC.
CUYAHOGA COUNTY
OHD 071 107 791
CLOSURE

CERTIFIED MAIL

Mr. Michael V. Gaudette
Van Waters & Rogers Inc.
600 Hunter Drive
Oak Brook, IL 60521

Dear Mr. Gaudette:

This office received your soil sampling and analysis plan on August 20, 1992 in response to the Ohio EPA's July 23, 1992 letter.

Based upon review of the plan, this office hereby approves the plan with the following modifications:

1) Van Waters & Rogers' (VW&R) soil sampling and analysis plan is hereby amended to modify its soil boring and sampling locations as shown in the attached map.

2) The soil sampling and analysis plan is hereby amended to state that rinseate contaminated with Volatile Organic Compounds (VOCs) shall be managed as hazardous waste and disposed of properly.

3) VW&R shall contact and notify the Ohio EPA Northeast District Office at least five (5) business days prior to sampling implementation so that an inspector may be present to observe the activities.

Please proceed with implementation within thirty (30) days of the receipt of this letter. If you have any questions concerning this letter, please feel free to contact me at (216) 963-1192.

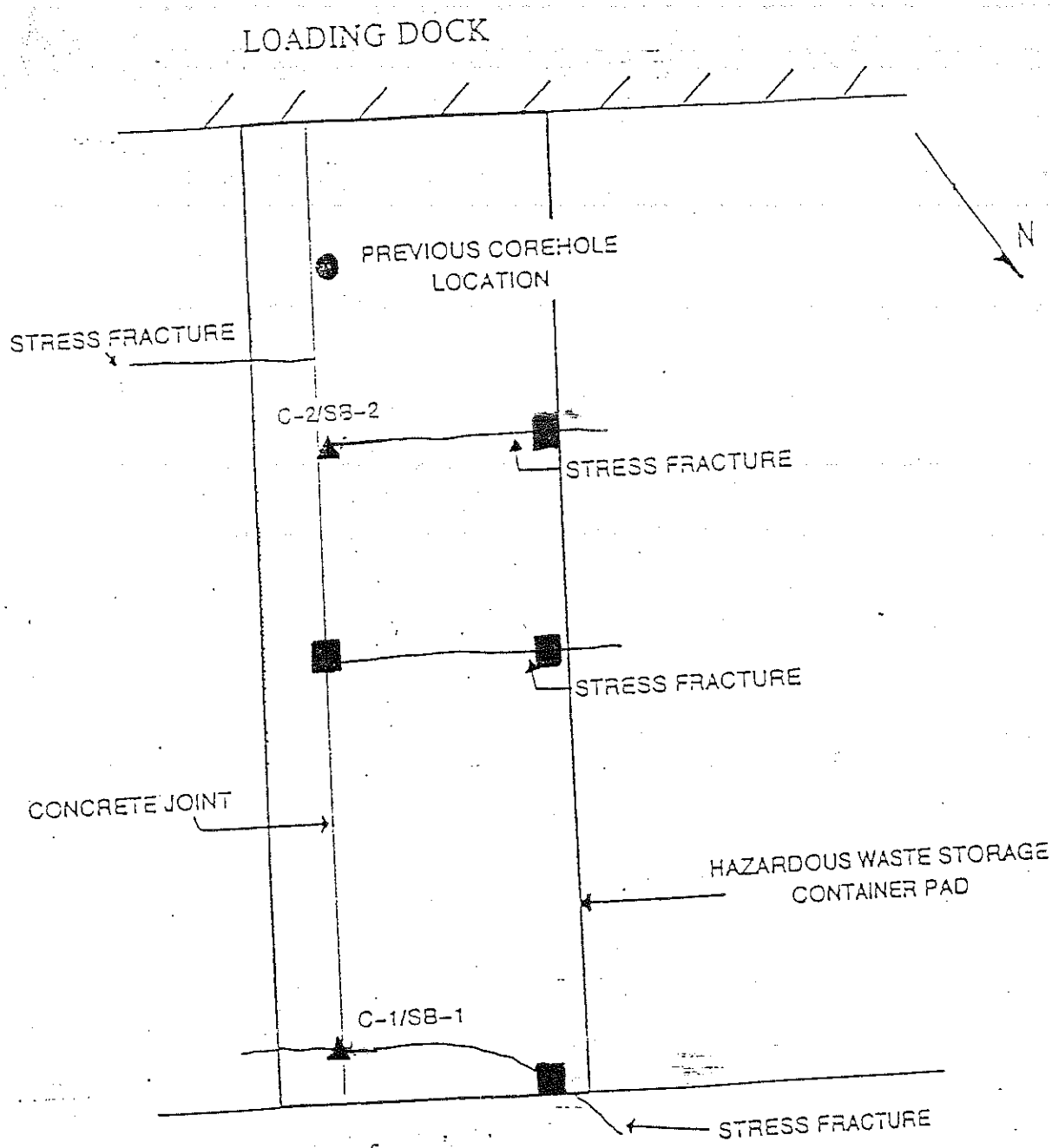
Sincerely,

Murat Tukel

Murat Tukel
Environmental Engineer
Division of Hazardous Waste Management

cc: Laurie Stevenson, DHWM, CO
Harry Courtright, DHWM, NEDO
Steve Bouchard, US EPA-Region V

MT/fwn



GERAGHTY & MILLER, INC.
Environmental Services

SAMPLE LOCATION MAP
VAN WATERS & ROGERS INC.
BEDFORD HEIGHTS, OHIO

FIGURE
2

0 6'

Van Waters & Rogers Inc.
subsidiary of **Univar**

600 HUNTER DRIVE
OAK BROOK, IL 60521-1926
PHONE (708) 573-4300
FAX (708) 573-2536

FEDERAL EXPRESS OVERNIGHT DELIVERY
AIRBILL #4181656813

August 19, 1992

Mr. Murat Tukel
Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1969

RE: Soil Sampling and Analysis Plan
Bedford Heights, Cuyahoga County, Ohio
OHD 071 107 791

Dear Mr. Tukel:

Van Waters & Rogers Inc. (VW&R) is submitting this soil sampling and analysis plan in response to the July 23, 1992 request by the Ohio Environmental Protection Agency (OEPA) for additional soil characterization beneath the concrete pad in the former hazardous waste container storage area at the referenced facility. This request was made because compounds that were handled in the former hazardous waste container storage area were detected above the standard laboratory method detection limits (MDLs) in soil samples collected by Geraghty & Miller, Inc. during April 1992 as part of additional closure activities. Specifically, xylenes (total) were detected in the soil sample collected from soil boring SB-1 at 0.015 milligrams per kilogram (mg/kg), and 1,1,1-trichloroethane and tetrachloroethylene were each detected in the sample collected from boring SB-2 at 0.018 mg/kg. Details of Geraghty & Miller's sampling methodology and analytical results were documented in their report to VW&R dated June 12, 1992. VW&R will complete additional soil sampling activities beneath the former hazardous waste container storage area as specified in the soil sampling and analysis plan presented herein. The necessity for soil excavation from beneath the former storage area, or implementation of other soil remedial activities, will be determined based on the soil analytical data.

SCOPE OF WORK

The soil sampling and analysis plan for the former hazardous waste container storage area at the VW&R Bedford Heights facility is presented in this letter. The plan will consist of the following activities:

- Collection of soil samples,
- Analysis of each soil sample for compounds previously stored on the concrete pad,

- QA/QC provisions, and

- Preparation of a report to document the sampling methodology and present analytical results.

VW&R proposes four coreholes be drilled through the concrete pad followed by advancement of soil borings through the unconsolidated materials to a depth of approximately three feet. Coreholes shall be drilled using an electric-powered coring device; soil borings shall be drilled using a hand auger. The general locations of the soil borings shall be in close proximity to former borings SB-1 and SB-2 and along the western edge of the concrete pad. Approximate locations of the borings are depicted on the attached figure. The exact locations of the borings shall be finalized in the field. Upon completion of sample collection activities, the boreholes will be grouted with concrete.

Soil samples shall be collected at 1 1/2-foot intervals to an approximate depth of three feet. A hand auger will be used to bore down to the zone to be sampled. The auger will then be removed from the borehole, decontaminated, and then placed back into the borehole. A soil sample shall be collected by advancing the hand auger an additional foot into the undisturbed sediments. After the auger is withdrawn from the borehole, a grab sample will be extracted from the hand auger and placed in appropriate sample containers provided by the analytical laboratory. Each soil sample shall be submitted to an analytical laboratory, under proper chain-of-custody, for chemical analysis. Analytes shall include volatile organic compounds utilizing EPA Methods 8010 and 8020, semi-volatile compounds utilizing EPA Method 8270, and alcohols utilizing EPA Method 8015. These are the same analytical methods used during the previous closure activities of the storage area.

An organic vapor analyzer (OVA) will be utilized throughout the augering and sampling activities to screen the soil for the presence of volatile organic compounds. Screening shall be conducted by placing a grab sample of soil in a glass jar, covering the jar's mouth with a foil sheet, and sealing the jar with a screw-type lid. After allowing for volatilization of organic vapors from the soil to the jar's headspace, the vapor concentration will be measured by removing the screw cap and piercing the foil sheet with the OVA's probe. The resultant OVA measurement, in parts per million, will be recorded on appropriate sampling logs. A description of the soil shall also be recorded on the sampling log.

A quality assurance program consisting of collection of a duplicate soil sample and a rinsate blank shall be implemented to monitor equipment decontamination procedures and laboratory performance. The duplicate soil sample shall be collected by placing soil obtained from one of the sampling zones in two sample jars. Each jar will be marked with a separate sample identification and be analyzed for VOCs utilizing EPA Method 8240.

The rinsate blank shall be collected after the soil sampling equipment has been decontaminated. Decontamination shall consist of washing the equipment with a laboratory-grade soap and distilled water solution, followed by multiple distilled water rinses. After the last rinse is completed, an additional rinse will be performed and the rinsate collected in a sample jar supplied by the laboratory and analyzed for VOCs utilizing EPA Method 8240.
VW&R shall prepare a letter report for submittal to the OEPA to document the sampling activities and present the analytical results. Supporting documentation shall be included as attachments to the report.

SCHEDULE

The proposed sampling and analysis program can commence within four weeks of receipt of either written or verbal approval of this letter by the OEPA, whichever is sooner. If verbal approval is given first, however, VW&R requests that it be followed up by the OEPA with a written document. The four-week lead time is necessary since contractors generally require at least two weeks notice for scheduling purposes.

The sampling and analysis program can be completed within 90 days of approval of this proposal. The turnaround time for the laboratory analysis will be approximately three to four weeks, depending on the laboratory and its work load. The report will be submitted within four weeks of receipt of the analytical results from the laboratory.

If you have any questions or require additional information, please do no hesitate to contact me at (708) 573-4361, or leave a voice mail message at (800) 284-6264, extension 8455.

Respectfully,

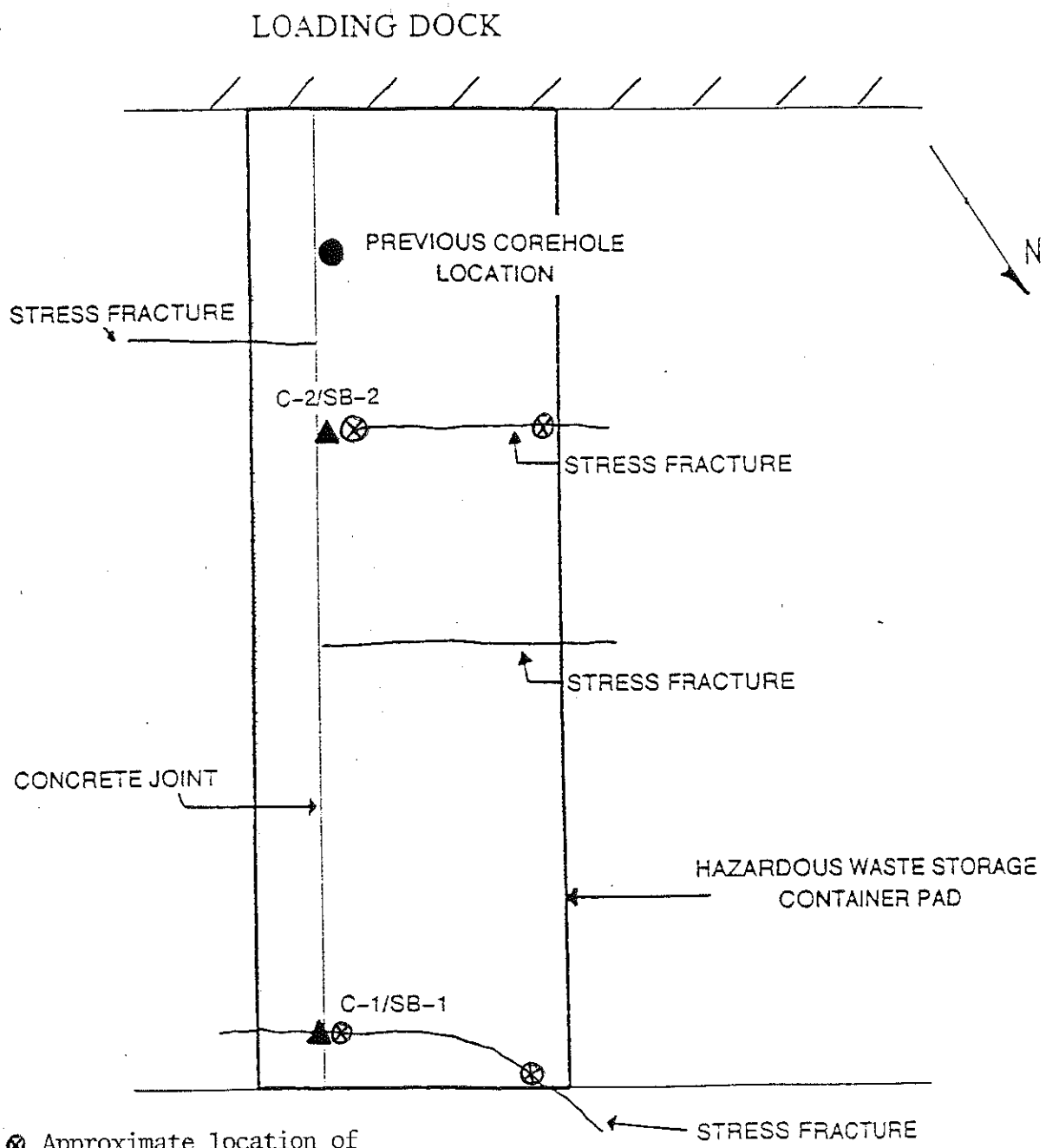
VAN WATERS & ROGERS INC.

Michael V. Gaudette

Michael V. Gaudette
Senior Project Manager
MVG:be

cc: Steve Bouchard
U. S. EPA, Region V
Ohio RCRA Permitting Section - HRP-7J
77 West Jackson Blvd.
Chicago, IL 60604-3590

Robert D. Hickman, VW&R, Northern Region Office
James P. Hooper, VW&R, Northern Region Office
Russell Karney, VW&R, Cleveland Area Office



GERAGHTY & MILLER, INC.
Environmental Services

SAMPLE LOCATION MAP
VAN WATERS & ROGERS INC.
BEDFORD HEIGHTS, OHIO

FIGURE
2